

John E. Montague  
939 Arbor Avenue  
Mahtomedi, MN 55115-1704

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April 6, 1995

RE: RM-8626

Secretary  
Federal Communications Commission  
Washington, DC 20554

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Gentlemen:

I write in opposition to placing any new restrictions on or prohibiting the one-way transmission of code practice and news items of interest to the Amateur Radio community.

For many prospective licensees the only regularly available and affordable source of gradable code practice is code practice transmissions of readily available published text provided by public spirited individuals and organizations. Even though alternative sources exist as commercially available audio tapes and computer programs they all require an expenditure by the prospective licensee that increases the cost of entry to the ranks of licensed Amateurs beyond the cost of equipping an Amateur Radio Station. For thirty years I have helped people learn the skills and technical bag of tricks needed to become Amateur Radio Operators. Often the biggest hurdle for them has been financial. Many elementary receivers have emerged from my junk box to make code practice available financially disadvantaged individuals. At least some of these people would never have become licensed Amateurs without the ready and regular availability of code practice transmissions in the HF bands. This remains true today in the era of codeless licenses; the least costly way to equip a station is as a low frequency (< 15 MHz) CW only station that is usable only with a license class that has a code test requirement.

There are many practical aspects of operating on the HF bands that are conveniently learned and perfected by both prospective and seasoned Amateurs through receiving code practice and news transmissions. Elementary aspects of propagation are absorbed by observing on different frequencies when transmissions of a known and reliable quality are present and copyable. This is not simply noting the

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presence or lack of a signal. It involves observation of fading characteristics, signal quality variations due to propagation effects, the nature and source of interference, etc. Practical operating skills are honed by using real receiving equipment in the presence of interference, noise, and other annoying effects – something never fully duplicated by audio tapes or computer simulations. Also, it is not just a matter of CW reception. These transmissions are made in a variety of modes. They offer a reliable source for perfecting operator skills, equipment design, station installation, and operating technique for all transmission modes, both digital (RTTY, AMTOR, Packet, etc.) and analog. The point I wish to make here is: these transmissions provide unique technical value to a large population of Amateur Radio licensees (of all levels of technical sophistication and operational skill maturity) that is derived from their availability on all HF bands and in all transmission modes, not just from their content.

Last, I have found the content of Amateur Radio related news transmissions to be an ongoing source of valuable information. Availability of these transmissions on the HF bands (3-30 MHz) has been essential for my consistent access and therefore their utility. This is true despite my good fortune of being able to afford computing equipment and the station equipment to engage in most transmission modes afforded Amateur Radio operators on bands from 1.8 MHz through 1.2 GHz. I believe that a substantial portion of the Amateur Radio community holds the HF transmission of news material valuable.

I urge the Commission to reject RM-8626 and any other proposal that would restrict or curtail the one-way transmission of code practice and news items of interest to the Amateur Radio community, particularly on the HF bands, beyond the restrictions imposed by current rules and regulations.

Respectfully yours,

  
John E. Montague  
Amateur Extra Class licensee

cc: Raymond A. Kowalski, Keller and Heckman, 1001 G Street NW,  
Washington, DC 20001  
American Radio Relay League, 225 Main Street, Newington, CT 06111